

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC, *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Docket Ref. No. _____

**ORDER AUTHORIZING DSM-FIRMENICH TO FILE UNDER SEAL CERTAIN
INFORMATION CONTAINED IN
THE MOTION OF DSM-FIRMENICH TO COMPEL DEBTORS'
COMPLIANCE WITH SECTION 365(N)(4) OF THE BANKRUPTCY CODE**

Upon the motion to seal (the “Motion to Seal”) filed by DSM Nutritional Products Ltd. and its affiliates (including Firmenich S.A.) (collectively, “DSM-Firmenich”); and this Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b), and the Amended Standing Order; and this Court having found that venue of these Chapter 11 Cases and the Motion to Seal in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that notice of the Motion to Seal has been given as set forth in the Motion to Seal and that such notice is adequate and no other or further notice need be given; and this Court having found and determined that the relief sought in the Motion to Seal is in the best interests of the Debtors, their estates, their creditors and all other parties in

1 A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.stretto.com/amyris>. The location of Debtor Amyris Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608

interest; and that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is granted as set forth herein.
2. Pursuant to section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018, DSM-Firmenich is authorized to file the LDRA, Escrow Agreement Documents, and commercially-sensitive summary descriptions thereof in the Motion to Compel (including Exhibit E thereto), under seal, including all information directly related thereto.
3. The LDRA, Escrow Agreement Documents, and commercially-sensitive summary descriptions thereof in the Motion to Compel shall remain confidential, be filed under seal, and shall be served on and made available on a confidential basis to: (i) the U.S. Trustee; (ii) counsel to the Debtors, (iii) counsel to the Committee (on a professional-eyes only basis); and (v) such other parties as ordered by this Court or as agreed to in writing by DSM-Firmenich.
4. Except as otherwise agreed to by DSM-Firmenich, any pleadings filed in these Chapter 11 Cases that reference or disclose the LDRA or the Escrow Agreement Documents shall be filed under seal and served only on those parties authorized in paragraph 3 of this Order to receive such information.
5. Any party who receives the LDRA, Escrow Agreement Documents or the unredacted version of the Motion to Compel in accordance with this Order shall not disclose or otherwise disseminate such information pertaining to the LDRA or Escrow Agreement Documents to any other person or entity.

6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order, including the authority to impose sanctions on any person that violates this Order.